

STATEMENT OF BASIS (AI No. 2920)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0099457 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Dresser, Inc.
Dresser Consolidated
P.O. Box 1430
Alexandria, LA 71309

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Kelli Hamilton

DATE PREPARED: December 30, 2009

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permit - LPDES permit effective date: February 1, 2005
LPDES permit expiration date: January 31, 2010
EPA has not retained enforcement authority.

C. Date Application Received: June 23, 2009

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - valve manufacturing facility

Dresser Consolidated produces valves and components for high pressure industrial applications. Dresser purchases castings, forgings, and fabricated machine parts to mill into industrial safety relief valves and pilot operated valves.

Dresser Flow Control's process wastewater discharge is subject to the EPA Effluent Limitation Guidelines (ELG) and Standards for Metal Products and Machinery, as found at 40 CFR 438 Subpart A.; however, more stringent state requirements are being placed in the permit.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 3491

C. LOCATION - the intersection of Louisiana Highway 3225 and US Highway 167 North in Alexandria, Rapides Parish Latitude 31°25'2", Longitude 92°28'37"

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3. OUTFALL INFORMATION

Outfall 001 has been deleted.

Outfall 101

Discharge Type: treated sanitary wastewater
Treatment: three oxidation ponds with biological and mechanical aeration treatment
Location: at the point of discharge from the final oxidation pond
Flow: 1000 gpd
Discharge Route: local drainage, thence into Rigolette Bayou

Outfall 201

Discharge Type: process wastewater, steam condensate, cooling tower blowdown, boiler blowdown, washwater, parts rinse water, hydrostatic test water, reverse osmosis reject water, fire test water
Treatment: settling basin
Location: at the point of discharge from the weir at the end of the settling basin
Flow: 0.122 MGD
Discharge Route: local drainage, thence into Rigolette Bayou

4. RECEIVING WATERS

STREAM - local drainage, thence into Rigolette Bayou

BASIN AND SEGMENT - Red River Basin, Segment 101301

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
f. agriculture

5. TMDL STATUS

Subsegment 101301, Rigolette Bayou-From headwaters to Red River, is not listed on LDEQ's Final 2006 303(d) list as impaired. However, subsegment 101301 was previously listed as impaired for total fecal coliform and dissolved oxygen, for which the below TMDL's have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge,

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or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDL's have been established for subsegment 101301:

Bayou Rigolette and Iatt Lake TMDL for Dissolved Oxygen

According to the TMDL, "reductions from point source discharges are not required..." BOD5 limitations are included in the permit.

TMDLs for FCB, Cl, SO4, TDS, and Turbidity for Selected Subsegments in the Red River Basin

According to the TMDL, as long as point source discharges of treated sanitary wastewater contain a fecal coliform limitation no higher than the water quality criteria, no change in the permit limits is required. Fecal Coliform limitations are included in the permit.

6. CHANGES FROM PREVIOUS PERMIT

Outfall 001 was previously monitored effluent from internal Outfalls 101 and 201 and the intermittent discharge of low contamination potential stormwater runoff from the plant area and uncontaminated stormwater runoff from the undeveloped areas west and southwest of the plant. Stormwater coverage is required based on the designated SIC code. There have been no excursions from Outfall 001. Therefore, Outfall 001 has been deleted. Stormwater coverage will be maintained through Stormwater Pollution Prevention Plan requirements in the permit. Outfalls 101 and 201 are no longer internal outfalls, but will retain the 101 and 201 designations for consistency.

Total Copper Limits and Total Zinc reporting requirements have been removed from Outfall 201. The calculated average of each was below the respective MQL; therefore, they were not screened for a water quality based limit. The water quality based limit for Total Cadmium has decreased based on the current water quality screen.

At the request of the facility, and due to consistent compliance, the monitoring frequency of TSS and Oil & Grease at Outfall 201 has been reduced from 1/month to quarterly. Since Total Cadmium is a water quality based limit, monitoring frequency will remain monthly.

Weekly Average Limitations for Outfall 101 have been changed to Daily Maximum Limitations.

pH has been added to Outfall 101 and Outfall 201.

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7. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

No records of recent compliance actions were found.

An inspection was conducted November 19, 2009. EDMS document 44462557.

B. DMR Review/Excursions - A DMR review was completed for July 2007 through June 2009. The following excursions were reported:

| <u>DATE</u> | <u>PARAMETER</u> | <u>OUTFALL</u> | <u>REPORTED VALUE</u> | | <u>PERMIT LIMITS</u> | |
|-------------|-------------------|----------------|----------------------------|--------------------------|----------------------------|--------------------------|
| | | | <u>MONTHLY AVERAGE</u> | <u>DAILY MAXIMUM</u> | <u>MONTHLY AVERAGE</u> | <u>DAILY MAXIMUM</u> |
| 3/09 | Fecal Coliform | 101 | 272 | 272 | 200 | 400 |
| 6/09 | Fecal Coliform | 101 | 224 | 224 | 200 | 400 |

8. EXISTING EFFLUENT LIMITS

Outfall 001

TOC -:50 mg/l
 Oil & Grease -:15 mg/l
 pH 6-9 s.u.

Outfall 101

BOD 30:45 mg/l
 TSS 90:135 mg/l
 Fecal Coliform 200:400 colonies/ml

Outfall 201

TSS -:45 mg/l
 Oil & Grease -:15 mg/l
 Total Copper 23:55 µg/l
 Total Cadmium 6:14 µg/l
 Total Zinc Report:Report

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9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 101301 of the Red River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Louisiana Pearlshell Mussel, which is/are listed as a threatened and/or endangered species. This draft permit has been submitted to the FWS for review in accordance with a letter dated 11/17/08 from Rieck (FWS) to Nolan (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and after consultation with FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Louisiana Pearlshell Mussel. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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13. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 3491 are considered to have storm water discharges associated with industrial activity.

For first time permit issuance, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. For renewal permit issuance, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility. (see Narrative Requirements for the AI)

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Rationale for Dresser, Inc.

1. Outfall 101 treated sanitary wastewater (estimated flow is 1000 gpd)

| <u>Pollutant</u> | <u>Limitation</u> Mo. Avg:Daily Max (mg/l) | <u>Reference</u> |
|------------------|--|---|
| Flow (MGD) | Report:Report | LAC 33:IX.2707.I.1.b |
| BOD ₅ | 30:45 | See limits justification (1), (2) below |
| TSS | 90:135 | See limits justification (1), (2) below |
| Fecal Coliform | 200:400 | See limits justification (1), (2) below |
| pH (s.u.) | 6.0:9.0 (min:max) | See limits justification (2) below |

Treatment: three oxidation ponds with biological and mechanical aeration treatment

Monitoring Frequency: quarterly

Limits Justification:

- 1) Sanitary wastewater regulated in accordance with LAC 33:IX.711 or LAC 33:IX.709.B - TSS limits of 90 mg/l monthly average and 135 mg/l weekly average are in accordance with LAC 33:IX.711.D, Treatment Equivalent to Secondary Treatment, for oxidation ponds. Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which expresses BOD₅ and TSS in terms of concentration.
- 2) BPJ utilizing the LPDES Class II Sanitary General Permit, and the previous permit.

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2. Outfall 201 process wastewater, steam condensate, cooling tower blowdown, boiler blowdown, washwater, parts rinse water, hydrostatic test water, reverse osmosis reject water, fire test water (estimated flow is 0.122 MGD)

| <u>Pollutant</u> | <u>Limitation</u> MO. Avg:Daily Max. (mg/l) | <u>Reference</u> |
|------------------|---|---|
| Flow (MGD) | Report:Report | LAC 33:IX.2707.I.1.b |
| TSS | ---:45 | BPJ; *; Light Commercial General Permit |
| Oil and Grease | ---:15 | BPJ; *; Light Commercial General Permit |
| Total Cadmium | 2.4:5.7 µg/l | Water Quality Screen |
| pH (s.u.) | 6.0:9.0 (min:max) | 40 CFR 438.12 |

Treatment: settling

Monitoring Frequency: Total Cadmium shall be monitored monthly by grab sample. TSS, Oil and Grease, and pH shall be monitored quarterly by grab sample.

Limits Justification: The facility is subject to the Metal Products and Machinery ELGs, as found at 40 CFR §438.12. Facility operations are subject to these ELGs because, as defined in 40 CFR §438.1, they engage in the "manufacturing, rebuilding, or maintenance of metal parts, products, or machines for use in the" hardware industrial sector, which is one of the Metal Product & Machinery (MP&M) industrial sectors listed in the ELG. The ELGs establish the following limitations for TSS and Oil and Grease:

TSS (mg/l): 62 (daily max)

Oil & Grease (mg/l): 46 (daily max)

However, Louisiana DEQ guidelines for washwater and cooling tower blowdown are more stringent. Therefore, daily maximum TSS and oil and grease limits are established at 45 mg/l and 15 mg/l, respectively; these limits are BPJ based on existing permits for similar outfalls and the Light Commercial Facilities General Permit, LAG480000.

Based on a Water Quality Screen (see attached), limits are established for Total Cadmium.

* Existing permits for similar outfalls
 BPJ Best Professional Judgement
 su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.